

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

**IN RE: JOAN M. FIGUEROO-CASTILLO and YURIDANIA D. SUERO
DEBTORS**

**Chapter 7
Case No. 14276**

*****)
Shamrock Finance LLC,)
Plaintiff)
)
v.)
)
Joan M. Figuereo-Castillo)
, Defendant)

**Adversary Proceeding No.
19-01014**

DEFENDANT'S ANSWER TO COMPLAINT

Factual Allegations

1. Defendant admits.
2. Defendant admits.
3. Defendant admits.
4. Defendant admits.
5. Defendant denies and calls upon Plaintiff to prove the same.
6. Defendant admits.
7. Defendant denies and calls upon Plaintiff to prove the same.

8. Defendant denies and calls upon Plaintiff to prove the same.
9. Defendant denies and calls upon Plaintiff to prove the same.
10. Defendant denies and calls upon Plaintiff to prove the same.
11. Defendant denies and calls upon Plaintiff to prove the same.
12. Defendant denies and calls upon Plaintiff to prove the same.
13. Defendant denies and calls upon Plaintiff to prove the same.
14. Defendant denies and calls upon Plaintiff to prove the same.
15. Defendant denies and calls upon Plaintiff to prove the same.
16. Defendant denies and calls upon Plaintiff to prove the same.
17. Defendant denies and calls upon Plaintiff to prove the same.
18. Defendant denies and calls upon Plaintiff to prove the same.
19. Defendant denies and calls upon Plaintiff to prove the same.
20. Defendant denies and calls upon Plaintiff to prove the same.
21. Defendant denies and calls upon Plaintiff to prove the same.
22. Defendant denies and calls upon Plaintiff to prove the same.
23. No response required.
24. Defendant denies and calls upon Plaintiff to prove the same.
25. Defendant denies and calls upon Plaintiff to prove the same.
26. Defendant denies and calls upon Plaintiff to prove the same.
27. Defendant denies and calls upon Plaintiff to prove the same.
28. Defendant denies and calls upon Plaintiff to prove the same.
29. Defendant denies and calls upon Plaintiff to prove the same.
30. Defendant denies and calls upon Plaintiff to prove the same.

31. Defendant denies and calls upon Plaintiff to prove the same.
32. Defendant denies and calls upon Plaintiff to prove the same.
33. Defendant denies and calls upon Plaintiff to prove the same.
34. Defendant denies and calls upon Plaintiff to prove the same.
35. Defendant denies and calls upon Plaintiff to prove the same.
36. Defendant denies and calls upon Plaintiff to prove the same.
37. No response is required.
38. Defendant denies and calls upon Plaintiff to prove the same.
39. Defendant denies and calls upon Plaintiff to prove the same.
40. Defendant denies and calls upon Plaintiff to prove the same.
41. Defendant denies and calls upon Plaintiff to prove the same.
42. Defendant denies and calls upon Plaintiff to prove the same.
43. Defendant denies and calls upon Plaintiff to prove the same.
44. Defendant denies and calls upon Plaintiff to prove the same.
45. Defendant denies and calls upon Plaintiff to prove the same.
46. No response required.
47. Defendant denies and calls upon Plaintiff to prove the same.
48. Defendant denies and calls upon Plaintiff to prove the same.
49. Defendant denies and calls upon Plaintiff to prove the same.
50. Defendant denies and calls upon Plaintiff to prove the same.

Wherefore the Defendants pray that this Honorable Court:

- A. Deny the Requested Relief of the Plaintiff.
- B. Dismiss the Complaint as frivolous and without merit.
- C. Declare the Defendants Owner of the Vehicle.

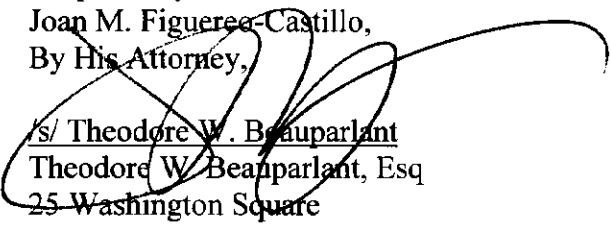
- D. Award legal fees to the Defendants to defend this frivolous claim.
- E. Grant such other relief as is equitable and just.

DEFENDANT DEMANDS A TRIAL BY JURY ON ALL MATTERS.

AFFIRMATIVE DEFENSES

1. The Plaintiff's complaint fails to state a claim for which relief can be granted.
2. The Plaintiff's complaint fails for lack of service of process.
3. The Plaintiff's is guilty of unclean hands.
4. Defendants are not liable in the capacity in which they had been sued in that at all times they were exercising their best business judgment and cannot be held liable for their acts, actions or omissions pursuant to the Business Judgment Rule.
5. Plaintiff is entitled to nothing because they have failed to mitigate their damages.
6. Plaintiff is barred from recovery because of its own conduct, or by the conduct of its agents, representatives and consultants.
7. Plaintiff is barred from recovery because of res judicata.
8. The Plaintiff is guilty of laches.
9. Plaintiff's claims are barred, in whole or in part, because Plaintiff has not sustained loss, damage, harm or detriment in any amount.

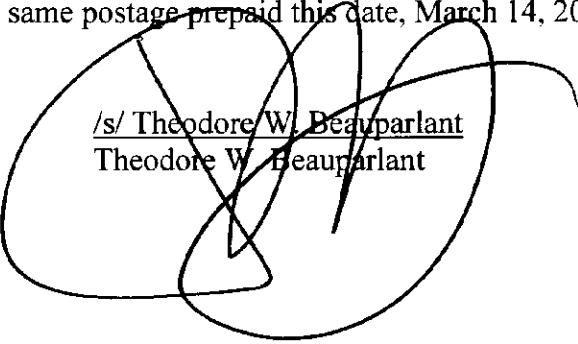
Respectfully submitted,
Joan M. Figueroa-Castillo,
By His Attorney,


/s/ Theodore W. Beauparlant
Theodore W. Beauparlant, Esq
25 Washington Square
Haverhill, MA 01830
(978) 521-4477
BBO#553763

Dated: March 14, 2019

CERTIFICATE OF SERVICE

I hereby state the above Answer to Complaint was filed electronically to all ECF participants as well as to Attorney for the Plaintiff, James J. McNulty, 40 Court Street, 11th Floor, Boston, MA 02108, and by mail to the same postage prepaid this date, March 14, 2019.


/s/ Theodore W. Beauparlant
Theodore W. Beauparlant